

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

THE UNITED STATES OF AMERICA

**MAY 2013 GRAND JURY
(Impaneled 5/3/13)**

-vs-

INDICTMENT

**KENNETH WHITE (Counts 1 thru 9)and
CAITLIN CONNELLY (Count 1)**

Violations:
Title 18, United States Code, Sections
1591(a), 1591(b)(1), 1591(b)(2),
1594(c) and 2421
(9 Counts and Forfeiture Allegation)

**COUNT 1
(Sex Trafficking – Conspiracy)**

The Grand Jury Charges That:

From in or about 2005 and continuing through in or about December 2012, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendants, KENNETH WHITE and CAITLIN CONNELLY, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and effecting interstate commerce, persons, including Victim 1, Victim 2, Victim 3, Victim 4, and Victim 5, persons known to the Grand Jury, and to benefit financially and by receiving things of value from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and a combination of such means, would be used to cause the persons to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(1).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2
(Sex Trafficking of a Minor and by Force, Fraud or Coercion)

The Grand Jury Further Charges That:

From in or about 2005 and continuing through in or about 2006, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means, in and affecting interstate commerce, Victim 1, a person known to the Grand Jury, and did benefit financially and by receiving things of value from participation in a venture which engaged in such acts, knowing that force, fraud, and coercion would be used to cause Victim 1 to engage in a commercial sex act, and that Victim 1 had not attained the age of 18 years and would be caused to engage in a commercial sex.

All in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), 1591(b)(2) and 2.

COUNT 3
(Sex Trafficking by Force, Fraud or Coercion)

The Grand Jury Further Charges That:

From in or about March 2007 and continuing through in or about December 2009, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 2, a person known to the Grand Jury, and did benefit financially and by receiving things of value from

participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and a combination of such means, would be used to cause Victim 2 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1) and 2.

COUNT 4
(Interstate Transportation for Purposes of Prostitution)

The Grand Jury Further Charges That:

From in or about March 2007 and continuing through in or about December 2009, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly transport Victim 2, a person known to the Grand Jury, in interstate commerce between Ohio, Pennsylvania, Nevada, and New York, with the intent that Victim 2 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421 and 2.

COUNT 5
(Sex Trafficking by Force, Fraud or Coercion)

The Grand Jury Further Charges That:

From in or about January 2009 and continuing through in or about January 2010, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 4, a person

known to the Grand Jury, and did benefit financially and by receiving things of value from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and a combination of such means, would be used to cause Victim 4 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1) and 2.

COUNT 6
(Interstate Transportation for Purposes of Prostitution)

The Grand Jury Further Charges That:

From in or about January 2009 and continuing through in or about January 2010, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly transport Victim 4, a person known to the Grand Jury, in interstate commerce between Maryland, New Jersey, and New York, with the intent that Victim 4 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421 and 2.

COUNT 7
(Sex Trafficking by Force, Fraud or Coercion)

The Grand Jury Further Charges That:

From in or about 2009 and continuing through in or about 2010, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 5, a person known to the Grand

Jury, and did benefit financially and by receiving things of value from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and a combination of such means, would be used to cause Victim 5 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1) and 2.

COUNT 8

(Interstate Transportation for Purposes of Prostitution)

The Grand Jury Further Charges That:

From sometime in or about 2009, and continuing through in or about 2010, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly transport Victim 5, a person known to the Grand Jury, in interstate commerce between Maryland, New Jersey, and New York, with the intent that Victim 5 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421 and 2.

COUNT 9

(Interstate Transportation for Purposes of Prostitution)

The Grand Jury Further Charges That:

From in or about September 2009 and continuing through in or about December 2010, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, KENNETH WHITE, did knowingly transport Victim 6, a person known to the Grand Jury, in interstate commerce between Pennsylvania, New Jersey, and New York, with

the intent that Victim 6 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421 and 2.

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

As a result of his convictions for committing the offenses alleged in Counts 1 through 9 of the Indictment, or any one of them, the defendant, KENNETH WHITE, shall forfeit to the United States all property, real and personal, used or intended to be used to commit or promote the commission of the offenses of conviction, and all property constituting or derived and traceable to the proceeds obtained from or traceable to such offense including the following:

MONETARY AMOUNT

The sum of One Million (\$1,000,000.00) dollars United States currency, said amount if not readily available to be in the form of a money judgment.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;

- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above property.

All pursuant to the provisions of Title 18, United States Code, Sections 1594(d) and 2428(a)(2), and Title 21, United States Code, Section 853(p).

DATED: Buffalo, New York, November 21, 2013.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON